



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

June 5, 2015

Ms. Valerie Nottingham
National Institutes of Health, ORF
B13/2S11, 9000 Rockville Pike
Bethesda, MD 20892

Subject: Draft Environmental Impact Statement for NIH Bethesda Chilled Water System Improvements CEQ #20150089

Dear Ms. Nottingham:

In accordance with Section 102(2) (c) of the National Environmental Policy Act (NEPA), 42 U.S.C. § 4332(2) (c), Section 309 of the Clean Air Act, 42 U.S.C. § 7609, and the Council on Environmental Quality (CEQ) regulations, 40 CFR Parts 1500-1508, the United States Environmental Protection Agency (EPA), has reviewed the Draft Environmental Impact Statement (EIS) for the above referenced projects and is providing the following comments.

As you are aware, the Draft EIS was prepared in order to assess three alternatives for the existing chilled water system at the National Institutes of Health (NIH) campus located in Bethesda, Maryland. The primary purpose of the chilled water system is to provide reliable building climate control for various buildings on campus. The three alternatives assessed include:

1. The Proposed Action Alternative – the installation of a Thermal Energy Storage System and an Industrial Water Storage System sufficient to provide storage capacity to meet two days of chilled water demand and two days of industrial water demand.
2. The Alternative Action – the installation of a Thermal Energy Storage System and a Potable Water Storage System sufficient to provide storage capacity to meet two days of chilled water demand and two days of potable water demand.
3. The No-Action Alternative – the existing chilled water system would remain the same with no improvements to the system.

The NIH has identified the Proposed Action Alternative as the preferred alternative in the draft EIS.



EPA has developed a set of criteria for evaluating and rating draft environmental impact statements. This rating system provides a basis upon which EPA makes recommendations to the lead agency. EPA's rating system consists of a two-part alphanumeric evaluation. The alpha criterion evaluates the environmental impact of the proposed action. The numeric criterion evaluates the adequacy of the Draft EIS. Based on this rating system, EPA has rated the NIH Draft EIS Lack of Objections (LO). The LO rating means the review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. An LO assumes a "1" numeric rating indicating that the Draft EIS adequately analyzes environmental impacts of the alternatives. A copy of our rating system can also be found at: <http://www.epa.gov/compliance/nepa/comments/ratings.html>.

EPA appreciates the NIH's commitment to implement measures compliant with Executive Order (EO) 13514 "Federal Leadership in Environmental, Energy, and Economic Performance" regarding energy efficiency, environmental site design and climate change reduction measures and as outlined in the Energy Policy Act of 2005 and the Energy Independence and Security Act of 2007. Please note that EO 13514 has been replaced by the March 19, 2015 EO "Planning for Federal Sustainability in the Next Decade". Federal agencies are tasked with meeting goals of the new EO and designing their agencies implementation plan, which should be incorporated into NIH's planning process for the Bethesda facility.

CEQ developed draft guidance for federal agencies' consideration as they analyze greenhouse gas (GHG) emissions and climate change impacts. We suggest that the environmental documentation include a discussion on resiliency to climate change in the project design for the Proposed Action Alternative. CEQ's revised draft guidance can be found at: <https://www.whitehouse.gov/administration/eop/ceq/initiatives/nepa/ghg-guidance>. EPA recommends that the Final EIS clarify Table 4-4 (Projected Greenhouse Gas Emissions Resulting from the Alternative Action) by inserting a footnote to indicate that the preferred alternative has estimated equal or less GHG than the other build alternative.

EPA appreciates the opportunity to provide comments on this project. If you have any questions, please contact Mr. Kevin Magerr at (215)-814-5724.

Sincerely,



Barbara Rudnick
NEPA Team Leader

